

Beaumont, Tx.

4-2-2020  
April -2- 2020

United States District Court.

Southern District Court of New York  
The Daniel Patrick Moynihan United States Courthouse  
U.S. Courthouse - 500 Pearl Street.

Carlos Zavala

Defendant.

DOC # \_\_\_\_\_

N: 15 Cr. 174 (LGS)

RE : Solicitud de ampliación de tiempo  
Time Extension Request. to 2255

The defendant Carlos José Zavala Velasquez with all due respect, presents to the Honorable Court a consideration to request an extension of time of 9 (nine) months from May 15, 2020.

This to be able to present before the Honorable Court, the complete and legally

Structured document of motion 2255, where I will present valid arguments to be considered and reviewed by the Honorable Court, since they are elements that were not and have not been considered in my case.

## Grounds

Ground One.

Lack of "Subject matter Jurisdiction and Venue" in Violation of the Fifth and Sixth Amendment, Provision International Customary Law, including Lack of Compliance with due Process.

Ground Two

Plea of guilty Constitutional invalid, because the Court Lack Jurisdiction to accept the plea upon Information.

Ground three

Violation of the Vienna Convention, Article #36 to rule 5 (d) (1) (F) and 58 (b) (H).

### Ground Four

Violation of the United Nations Convention against  
Illicit Trafficking in Narcotic drug and Psychotropic  
Substances of 1988, Article # 3, Numeral 2 and 3.  
Article # 7 Numeral 2, regarding Mutual Legal Assistance.

### Ground Five

Violation of Mutual Legal Assistance (MLAT) Treaty  
of Santo Domingo, Dominican Republic of 2006

### Ground Six

Violation of the Interamerican Convention on  
Extradition, Article 21 Paragraph "b" regarding to  
the extradition. Article 33 Numeral 1 Paragraph  
"a", "b" and "c"; Numeral 2 regarding at the  
Beginning of the Specialty.  
and Others International Customary Laws.

### Ground Seven


Ineffective Assistance of Counsel.



I base the present application, by Virtue of the Current events that are developing in the United States and the Whole World with the "CoronaVirus Pandemic."

this has forced the Justice System to Limit its operation, Closing Normal Activities in the Courts and the Federal Prison System (BOP) to take Severe Quarantine and isolation measures, Which Caused the Closing of the legal library and there is not the necessary Legal assistance of a paralegal to help develop and structure a legal document, In addition to this, the post has Suffered delay in some important documents that will be presented in the Motion.

I respectfully request that this document be duly Filed where appropriate.  
Without any other Particular.

  
Carlos José Zavala Velasquez.  
ID. 91115-054